

Coachella Valley Water District Comments on California Statewide
Groundwater Elevation Monitoring Program Draft Procedures for Monitoring Entity Reporting
and Draft Groundwater Elevation Monitoring Guidelines

November 22, 2010

1. Coachella Valley Water District (CVWD) understands SBx7-6 mandates Monitoring Entity notification by January 1, 2011, and data submittals by January 1, 2012. The schedule for Monitoring Entities is rigorous. The time for collaborating with local agencies and developing Monitoring Plans is limited. The online notification and data submittal system is not yet complete and CVWD has received no information to indicate that future users have been provided the opportunity to beta test this system. Entities are unable to enter the database and review the monitoring entity application or data entry process. The State has had problems implementing State-wide data entry programs in the past, including the CIWQS program, which had to be discontinued shortly after implementation. It was not until the State implemented a comprehensive beta testing program that the problems with CIWQS were resolved. CVWD recommends that DWR implement a beta testing program for the database that will be used for CASGEM before implementing this program. This will likely require delaying the notification process for Monitoring Entities until this beta testing program is completed and any problems are resolved.
2. Potential Monitoring Entities are required to submit a map and shapefile showing the area to be monitored. Many potential Monitoring Entities do not have GIS capabilities to create maps or shapefiles. Entities without this capability would be unable to submit a complete application in accordance with the draft guidance. It is not clear if having GIS capability will then be a prerequisite for becoming a Monitoring Entity. This needs to be clarified in the guidance. It is also not clear whether DWR will offer GIS assistance to potential monitoring entities.
3. After Monitoring Entities are selected, they will need guidance developing their monitoring plans. In addition to being available for assistance, DWR should provide example templates of Monitoring Plans to help expedite development of Monitoring Entities' Monitoring Plans.